

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

In Re:

ARMANDO DIAZ GONZALEZ
IRENE DIAZ CARRION

Debtor(s)

Case No: 09-09036 ESL

Chapter 13

MOTION TO INFORM
POST CONFIRMATION MODIFICATION PLAN UNDER §1329

TO THE HONORABLE COURT:

NOW COMES the debtor, through the undersigned attorney, and very respectfully alleges and prays:

1. That today the debtor is filing an amended chapter 13 repayment plan.
2. That the reason for amendment is to adjust debtors payment schedules.

WHEREFORE, it is respectfully requests this Honorable Court to take notice of the aforementioned.

RESPECTFULLY SUBMITTED.

I HEREBY CERTIFY that a true and exact copy of the foregoing motion has been filed electronically with the Clerk of the Court using CM/ECF systems which will send notification of such to the Chapter 13 Trustee, and we sent copy of this document through regular mal to debtor (s) and all non CM/ECF participants interested parties to their addresses listed on the master address list.

In San Juan, Puerto Rico this 14TH day of March of 2011.

JPC LAW OFFICE

José M Prieto Carballo, Esq.
P.O. Box 363565
San Juan, P.R. 00936-3565
Tel (787) 607-2066 & Tel (787) 607-2166
jpc@jpclawpr.com

By: /s/ Jose M Prieto Carballo, Esq.

**United States Bankruptcy Court
District of Puerto Rico**

IN RE:

Case No. 09-09036-13

DIAZ GONZALEZ, ARMANDO & DIAZ CARRION, IRENE

Chapter 13

Debtor(s)

CHAPTER 13 PAYMENT PLAN

1. The future earnings of the Debtor(s) are submitted to the supervision and control of the Trustee and the Debtor(s) shall make payments to the Trustee ☒ directly ☐ by payroll deductions as hereinafter provided in the PAYMENT PLAN SCHEDULE.
2. The Trustee shall distribute the funds so received as hereinafter provided in the DISBURSEMENT SCHEDULE.

PLAN DATED: _____

☐ PRE ☐ POST-CONFIRMATION

☒ AMENDED PLAN DATED: 4-14-2011

Filed by: ☒ Debtor ☐ Trustee ☐ Other

I. PAYMENT PLAN SCHEDULE

\$ 500.00 x 18 = \$ 9,000.00
 \$ 400.00 x 42 = \$ 16,800.00
 \$ _____ x _____ = \$ _____
 \$ _____ x _____ = \$ _____
 \$ _____ x _____ = \$ _____

TOTAL: \$ 25,800.00

Additional Payments:

\$ _____ to be paid as a LUMP SUM
 within _____ with proceeds to come from:

☐ Sale of Property identified as follows:

☐ Other:

Periodic Payments to be made other than, and in
 addition to the above:

\$ _____ x _____ = \$ _____

PROPOSED BASE: \$ 25,800.00

**III. ATTORNEY'S FEES
(Treated as § 507 Priorities)**

Outstanding balance as per Rule 2016(b) Fee
 Disclosure Statement: \$ 2,524.00

Signed: /s/ ARMANDO DIAZ GONZALEZ

Debtor

/s/ IRENE DIAZ CARRION

Joint Debtor

II. DISBURSEMENT SCHEDULE

A. ADEQUATE PROTECTION PAYMENTS OR \$ _____

B. SECURED CLAIMS:

☐ Debtor represents no secured claims.

☒ Creditors having secured claims will retain their liens and shall be paid as follows:

1. ☒ Trustee pays secured ARREARS:

Cr. BANCO POPULAR DE PR Cr. _____
 # 071010011749499 # _____
 \$ 70.00 \$ _____

2. ☒ Trustee pays IN FULL Secured Claims:

Cr. BANCO BILBAO VIZCAY Cr. _____
 # 9609514923 # _____
 \$ 13,500.00 \$ _____

3. ☐ Trustee pays VALUE OF COLLATERAL:

Cr. _____ Cr. _____ Cr. _____
 # _____ # _____ # _____
 \$ _____ \$ _____ \$ _____

4. ☐ Debtor SURRENDERS COLLATERAL to Lien Holder:

5. ☐ Other:

6. ☒ Debtor otherwise maintains regular payments directly to:

BANCO POPULAR DE PR

C. PRIORITIES: The Trustee shall pay priorities in accordance with the law.
 11 U.S.C. § 507 and § 1322(a)(2)

D. UNSECURED CLAIMS: Plan ☐ Classifies ☒ Does not Classify Claims.

1. (a) Class A: ☐ Co-debtor Claims / ☐ Other: _____
☐ Paid 100% / ☐ Other: _____

Cr. _____ Cr. _____ Cr. _____
 # _____ # _____ # _____
 \$ _____ \$ _____ \$ _____

2. Unsecured Claims otherwise receive PRO-RATA disbursements.

OTHER PROVISIONS: (Executory contracts; payment of interest to unsecureds, etc.)
 ATTORNEYS FEES TO BE PAID FIRST.

ALL TAX REFUNDS TO BE RECEIVED DURING THE LIFE OF THE PLAN SHALL BE COMMITTED TO FUND THE PLAN.

INSURANCE QUOTE SHALL BE PROVIDED BY TRIPLE SSS (1,000.00)

ADEQUATE PROTECTION FOR BBVA WILL BE \$100.00

LIFT OF STAY IN FAVOR OF R&G BANK (IN REM REMEDIES)

Attorney for Debtor Jose Prieto

Phone: (787) 607-2066

Label Matrix for local noticing
0104-3
Case 09-09036-ESL13
District of Puerto Rico
Old San Juan
Thu Apr 14 13:55:52 AST 2011

EASTERN AMERICA INSURANCE COMPANY
PO BOX 9023862
SAN JUAN, PR 00902-3862

RECOVERY MANAGEMENT SYSTEMS CORP
25 SE 2ND AVE STE 1120
MIAMI, FL 33131-1605

ALL TOOLS
P O BOX 191784
SAN JUAN PR 00919-1784

BANCO POPULAR DE PR
P O BOX 362708
SAN JUAN, PR 00936-2708

EASTERN AMERICA INS. CO.
PO BOX 9023862
SAN JUAN, PR 00902-3862

JC PENNY
G E MONEY BANK
P O BOX 103104
ROSEVELL, GA 30076-9104

NCO FINANCIAL SYSTEM OF PR
P O BOX 192478
HATO REY, PR 00919-2478

PR ACQUISITIONS LLC
270 MUNOZ RIVERA AVENUE SUITE 400
SAN JUAN PR 00918-1910

Recovery Management Systems Corporation
For GE Money Bank
dba JCPENNEY CREDIT SERVICES
25 SE 2nd Ave Ste 1120
Miami FL 33131-1605

BANCO BILBAO VIZCAYA
ANGEL VAZQUEZ BAUZA ESQ
PO BOX 191017
SAN JUAN, PR 00919-1017

PR ACQUISITIONS LLC
AMERICAN INTL BUILDING
250 MUNOZ RIVERA AVENUE SUITE 1200
HATO REY, PR 00918-1814

RELIABLE FINANCIAL SERVICES
PO BOX 21382
SAN JUAN, PR 00928-1382

BANCO BILBAO VIZCAYA
P O BOX 364745
SAN JUAN, PR 00936-4745

BANCO POPULAR DE PUERTO RICO
c/o WALLACE VAZQUEZ SANABRIA
17 MEXICO STREET, SUITE D-1
SAN JUAN, PR 00917-2202

INTERNAL REVENUE SERVICES
P O BOX 219690
KANSAS CITY, MO 64121-9690

LCDO. RAMON RIVERA ITURBE
500 MUNOZ RIVERA SUITE 228-229
COND CENTRO II
HATO REY, PR 00918-3300

NORTH SHORE AGENCY
P O BOX 89010
WESTBURY, NY 11590-8901

RELIABLE FINANCIAL SERVICE
P O BOX 21382
SAN JUAN, PR 00928-1382

SAM'S CLUB
GE MONEY BANK
P O BOX 103104
ROSEWELL, GA 30076-9104

BANCO POPULAR PR
WALLACE VAZQUEZ SANABRIA ESQ
17 MEXICO STREET SUITE D-1
SAN JUAN, PR 00917-2202

R&G MORTGAGE CORPORATION
CARDONA JIMENEZ LAW OFFICE
PO BOX 9023593
SAN JUAN, PR 00902-3593

US Bankruptcy Court District of P.R.
U.S. Post Office and Courthouse Building
300 Recinto Sur Street, Room 109
San Juan, PR 00901-1964

BANCO BILBAO VIZCAYA ARG
ANGEL M VAZQUEZ BAUZA
PO BOX 191017
SAN JUAN PR 00919-1017

COLLECTION COMPANY AMERICA
700 LONGWATER DRIVE
NORWELL, MA 02061-1796

ISLAND FINANCE
P O BOX 195369
HATO REY, PR 00919-5369

Midland Credit Management, Inc.
8875 Aero Drive, Suite 200
San Diego, CA 92123-2255

PR ACQUISITIONS LLC
250 MUNOZ RIVERA AVENUE SUITE 1200
HATO REY, P.R 00918-1814

RG PREMIER BANK
P O BOX 362394
SAN JUAN, PR 00936-2394

SANTANDER FINANCIAL D/B/A ISLAND FINANCE
PO BOX 195369
SAN JUAN PR, 00919-5369

STANLEY SECURITY SOLUTION 14210 5505 N CUMBERLAND AVE SUITE 307 CHICAGO, IL 60656-1471	TRIPLE-S PROPIEDAD PO BOX 9023862 SAN JUAN, PR 00902-3862	VERIZON P O BOX 70366 SAN JUAN, PR 00936-8366
WESTENBANK P O BOX 1450 MAYAGUEZ, PR 00681-1450	ZALES 726 EXCHANGE STREET SUITE 700 BUFFALO, NY 14210-1464	ARMANDO DIAZ GONZALEZ 324 CALLE 4 VILLA NEVAREZ RIO PIEDRAS, PR 00927-5313
IRENE DIAZ CARRION 324 CALLE 4 VILLA NEVAREZ RIO PIEDRAS, PR 00927-5313	JOSE M PRIETO CARBALLO JPC LAW OFFICE PO BOX 363565 SAN JUAN, PR 00936-3565	JOSE RAMON CARRION MORALES PO BOX 9023884 SAN JUAN, PR 00902-3884
MONSITA LECAROS ARRIBAS OFFICE OF THE US TRUSTEE (UST) OCHOA BUILDING 500 TANCA STREET SUITE 301 SAN JUAN, PR 00901-1938		

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(d)R&G MORTGAGE CORPORATION CARDONA-JIMENEZ LAW OFFICE P.O. BOX 9023593 SAN JUAN, PR 00902-3593	End of Label Matrix Mailable recipients 39 Bypassed recipients 1 Total 40
--	--